

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. Appl. No.: 10/525,874

Attorney Docket No.: Q86537

**AMENDMENTS TO THE DRAWINGS**

Submitted herewith please find one (1) sheet of replacement drawings in compliance with 37 C.F.R. § 1.84. The Examiner is respectfully requested to acknowledge receipt of these drawings.

The submitted drawing is intended to replace the drawing previously submitted.

Attachment: Replacement Sheets: One (1)

**REMARKS**

Claims 1-69 are all the claims pending in the application.

Claim 1 has been amended merely to comply with the US patent practice standards, and does not affect the scope of the claim in any way, and no estoppel is intended.

Claims 3, 4 and 30 have been amended in response to the claim objections. Likewise, these amendments are not intended to narrow the scope of the claims.

**Drawings**

Applicant adds a legend --RELATED ART-- to FIG. 1 to overcome the objections to the same.

**Claim objections**

Claims 3, 4 and 30 are objected to under 37 C.F.R. 1.75(a), as failing to particularly point out and distinctly claim the subject matter. Applicant has amended these claims to address the objections. Therefore, Applicant respectfully requests that the objections be withdrawn.

**Rejection under 35 U.S.C. § 101**

Claims 67 and 68 are rejected under 35 U.S.C. § 101 directed to non-statutory subject matter. Applicant amends claims 67 and 68 to include the disclosed tangible computer readable storage medium.

Applicant respectfully submits that amended claims 67 and 68 comply with 35 U.S.C. § 101.

**Rejection under 35 U.S.C. § 102(b)**

Claims 1-32, 34-65, 67 and 68 are rejected under 35 U.S.C. 102(b) as being anticipated by Crabtree et al. (US 6,185,314). Applicant traverses these rejections because Crabtree fails to disclose or suggest all of the claim limitations.

**Claim 1**

Crabtree discloses that a region corresponder 500 is invoked to evaluate the degree of correspondence between an object extracted from the current frame and all the objects from the previous frame (col. 8, lines 16-20). However, Crabtree fails to disclose or suggest **establishing correspondences between object zones and objects**. Instead, Crabtree merely discloses establishing correspondences **between objects**. Next, Crabtree fails to disclose or suggest establishing correspondences between object zones and objects **on the basis of degrees of similarity between characteristic quantities of said object zones and said synthesized characteristic quantities**. Instead, Crabtree merely discloses establishing correspondences between objects from **different frames**.

Crabtree also discloses a correspondence score as a measure of correspondence of region clusters in consecutive video frames (col. 8, lines 37-43). Again, Crabtree fails to disclose or suggest **establishing correspondences between object zones and objects**. In an exemplary embodiment of the invention, fig. 5A-5C provide a clear distinction between an object zone and an object.

For at least the reasons submitted above, Applicant respectfully submits that Claim 1 is patentable.

For reasons similar to those submitted for claim 1, Applicant respectfully submits that claims 34, 67 and 68 are patentable.

Claims 2, 4-32, 35 and 37-65 which depend from claims 1 or 34, are patentable for the reasons submitted for their base claims.

Claim 3

The Examiner claims that Crabtree discloses an object-tracking device according to claim 2, provided with: a state-of-tracking means for deciding the states of tracking of individual objects or object zones. Crabtree discloses a split/merge resolver 700 that is tuned to resolve the splitting and merging of objects (col. 10, lines 26-30). A split/merge resolver 700 is merely used to split or merge multiple objects and the reference fails to disclose or suggest that a split/merge resolver 700 means relative positions of each object with respect to other objects. Also, a region corresponder 500 compares region clusters of a video frame with region clusters of a prior video frame, indicating that a region corresponder 500 only makes comparison between the same objects from current and previous video frames. Therefore, neither a split/merger resolver 700 nor a region corresponder 500 correspond to a state-of-tracking deciding means disclosed in claim 3.

In addition, Crabtree fails to disclose or suggest an object-tracking device according to claim 2, wherein said characteristic-quantity synthesizing means generates synthesized characteristic quantities through the use of said object characteristics quantities and the decision results effected by said state-of tracking deciding means. The Examiner claims that a region corresponder 500 in conjunction with a model matcher 600 corresponds to a characteristic

quantity synthesizing means, a merge responder 900 corresponds to a characteristic quantity generating means, and a OCGM 300 corresponds to a correspondence establishing means. The reference, however, merely discloses that a model matcher 600 generates at least one real-world feature for each region cluster by examining image information (col. 16, lines 9-21) and that a region responder 500 compares region of clusters of video frames (col. 18, line 66 - col. 19, line 2), but fails to disclose or suggest that a model matcher 600 in conjunction with a region responder 500 generates synthesized characteristic quantities through the use of a merge responder 900 and results effected by the split/merge resolver 700.

For at least the reasons submitted above, Applicant respectfully submits that Claim 3 is patentable.

Claim 36 which depends from claim 34, is patentable at least for the reasons submitted for its base claim and for reasons similar to those submitted for claim 3.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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